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UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re

LEHMAN BROTHERS HOLDINGS INC., et al.,

Debtors.

(Jointly Administered)

In re

LEHMAN BROTHERS INC.,

Debtor.

O8-13555 (JMP)

(Jointly Administered)

O8-01420 (JMP)

DECLARATION OF CHRISTOPHER M. GREEN IN SUPPORT OF BARCLAYS' MOTION TO COMPEL PRODUCTION OF DATA AND ANALYSES CONCERNING LBI'S 15c3-3 RESERVE CALCULATION Christopher M. Green, being duly sworn, declares under penalty of perjury that the following statements are true:

- 1. I am a partner in the law firm Boies, Schiller & Flexner LLP, attorneys for Barclays Capital Inc. ("Barclays"). I am an attorney duly admitted to practice in the State of New York, and in this Court. I make this declaration based on my personal knowledge, the knowledge of those with whom I work, and the documents referred to herein. I make this declaration in support of Barclays' Motion to Compel Production of Data and Analyses Concerning LBI'S 15c3-3 Reserve Calculation.
- 2. Exhibit A appended hereto is a true and correct copy of a letter dated November 4, 2009 from William Maguire to Hamish Hume.
- 3. Exhibit B appended hereto is a true and correct copy of Barclays Capital Inc.'s Third Request for Production of Documents to the Trustee in the Securities Investor Protection Act Liquidation of Lehman Brothers Inc.
- 4. Exhibit C appended hereto is a true and correct copy of the Trustee's Responses and Objections to Barclays Capital Inc.'s Third Request for Production of Documents.
- 5. Exhibit D appended hereto is a true and correct copy of Barclays' October 9, 2009 Subpoena to Deloitte.
- 6. Exhibit E appended hereto is a true and correct copy of Deloitte's October 21, 2009 Response to Barclays' October 9, 2009 Subpoena.
- 7. Exhibit F appended hereto is a true and correct copy of an excerpt from the transcript of Daniel McIsaac's deposition on April 6, 2010.
- 8. Exhibit G appended hereto are true and correct copies of the Affidavit of Daniel McIsaac, dated October 5, 2009; the Supplemental Affidavit of Daniel McIsaac, dated February 18, 2010; and the Rebuttal Report of Daniel McIsaac, dated March 14, 2010.

- 9. Exhibit H appended hereto is a true and correct copy of the TSG Transcript of proceedings in the above-captioned matter on September 10, 2010.
- 10. Exhibit I appended hereto is a true and correct copy of the Declaration of Robert Martini, dated April 5, 2010.
- 11. Exhibit J appended hereto is a true and correct copy of an excerpt from the transcript of Robert Martini's deposition on June 24, 2010.
- 12. Exhibit K appended hereto is a true and correct copy of the Expert Report of Peter Vinella, dated January 8, 2010.
- 13. Exhibit L appended hereto is a true and correct copy of an excerpt from the transcript of Peter Vinella's deposition on February 5, 2010.
- 14. Exhibit M appended hereto is a true and correct copy of Deposition Exhibit 599 (Movants' Trial Exhibit 756), which was marked during Robert Martini's deposition on June 24, 2010.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on September 21, 2010

Christopher M. Green